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12 *Attorneys for Defendants*
13 RIMINI STREET, INC. and SETH RAVIN

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19 UNITED STATES DISTRICT COURT
20 DISTRICT OF NEVADA

21 ORACLE USA, INC., a Colorado corporation;
22 ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
23 CORPORATION, a California corporation,

24 Plaintiffs,

25 v.

26 RIMINI STREET, INC. , a Nevada corporation;
27 SETH RAVIN, an individual,

28 Defendants.

Case No. 2:10-cv-0106-LRH-PAL

**DECLARATION OF ROBERT H.
RECKERS**

1 **DECLARATION OF ROBERT H. RECKERS**

2 I, Robert H. Reckers, have personal knowledge of the facts stated below and, under
3 penalty of perjury, hereby declare:

4 1. I am an attorney admitted to practice *pro hac vice* before this Court in the
5 above captioned matter, and an attorney at Shook, Hardy, and Bacon LLP, attorneys for Defendants
6 Rimini Street, Inc., and Seth Ravin (“Defendants”). I make this declaration in support of
7 Defendants’ statements regarding the discovery issues raised in the Joint Case Management
8 Statement filed on November 4, 2011.

9 2. Attached hereto as **Exhibit A** is a true and accurate copy of a document
10 produced by Rimini in this litigation bearing Bates labels RSI01990917-918.

11 3. Attached hereto as **Exhibit B** is a true and accurate copy of a document
12 produced by Rimini in this litigation bearing Bates labels RS104807259-61.

13 4. Attached hereto as **Exhibit C** is a true and accurate copy of a document
14 produced by Rimini in this litigation bearing Bates label RSI06276320.

15 5. Attached hereto as **Exhibit D** is a true and accurate copy of relevant excerpts
16 from the deposition of Krista Williams, a Rimini witness produced in response to Oracle’s
17 deposition notice served on September 28, 2011, taken on October 5, 2011.

18 6. Attached hereto as **Exhibit E** is a true and accurate copy of relevant excerpts
19 of Rimini’s Responses to Oracle’s Fifth Set of Interrogatories, served July 11, 2011.

20 7. Attached hereto as **Exhibit F** is a true and accurate copy of a July 26, 2011
21 letter from Mr. Ringgenberg to Mr. Reckers.

22 8. Attached hereto as **Exhibit G** is a true and accurate copy of relevant excerpts
23 of Rimini’s First Supplemental Responses to Oracle’s Fifth Set of Interrogatories, served September
24 8, 2011.

1 9. Attached hereto as **Exhibit H** is a true and accurate copy of relevant excerpts
2 from the deposition of J.R. Corpuz, a Rimini witness produced in response to Oracle's deposition
3 notice served on February 8, 2011, taken on March 15, 2011.

4 10. Attached hereto as **Exhibit I** is a true and accurate copy of an October 12,
5 2011 letter from Mr. Dykal to Mr. Hill.

6 11. Attached hereto as **Exhibit J** is a true and accurate copy of a June 6, 2011
7 letter from Mr. Russell to Mr. Reckers.

8 12. Attached hereto as **Exhibit K** is a true and accurate copy of a June 22, 2011
9 email from Mr. Reckers to Mr. Russell

10 13. Attached hereto as **Exhibit L** is a true and accurate copy of relevant excerpts
11 from the deposition of Seth Ravin, a witness produced on July 10, 2010 in response to an Oracle
12 deposition notice served in connection with the *Oracle Corp. et al v. SAP, AG* litigation.

13 14. Attached hereto as **Exhibit M** is a true and accurate copy of a November 2,
14 2011 email from Mr. Hixson to Mr. Reckers.

15
16 I declare under penalty of perjury under the laws of the United States that the
17 foregoing is true and correct.

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19 Executed on November 4, 2011

/s/ Robert H. Reckers

Robert H. Reckers, Esq.